

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**V.**

**PAUL J. MANAFORT, JR. and  
RICHARD W. GATES III,**

## Defendants.

**Crim. No. 17-201 (ABJ/DAR)**

**MOTION AND MEMORANDUM OF POINTS AND AUTHORITIES TO PERMIT  
APPEARANCE *PRO HAC VICE* OF COUNSEL FOR RICHARD W. GATES III**

Shanlon Wu, the undersigned counsel (“Counsel”) for Richard W. Gates III, hereby moves this Court for an Order permitting Walter Mack, a partner in Doar Rieck DeVita Kaley & Mack, and Annemarie McAvoy, an attorney and the managing member of McAvoy Consulting, LLC, to appear and practice *pro hac vice* in the above-captioned case. Pursuant to LCrR 44.1(d) of the Local Criminal Rules of the United States District Court for the District of Columbia (the “Local Rules” or “LCrR”), Counsel respectfully requests that this Court enter the accompanying Order permitting Walter Mack (“Mack”) and Annemarie McAvoy (“McAvoy”) to appear *pro hac vice* as co-counsel for Richard W. Gates III. In support, Counsel states as follows:

1. Mack is a member in good standing of the bar of New York (New York State Attorney Registration No. 1008309) and is licensed to practice law in the State of New York. In addition, Mack is admitted to practice before the following federal courts:

- United States District Court for the Eastern District of New York
- United States District Court for the Southern District of New York
- United States Court of Appeals for the Second Circuit

2. McAvoy is a member in good standing of the bar of New York (New York State Attorney Registration No. 2188076) and is licensed to practice law in the State of New York. In addition, McAvoy is admitted to practice before the following federal courts:

- United States District Court for the Eastern District of New York
- United States District Court of Appeals for the Second Circuit
- Supreme of the United States

3. Neither Mack nor McAvoy have been disciplined by any bar.

4. Mack is a partner in the law firm of Doar Rieck DeVita Kaley & Mack and McAvoy is the managing member of McAvoy Consulting, LLC. Set out below are their office addresses, telephone numbers and email addresses.

Doar Rieck DeVita Kaley & Mack 217 Broadway, Suite 707 New York, New York 10005 Telephone: (212) 619-3730 Facsimile: (212) 962-5037 <a href="http://www.doarlaw.com">www.doarlaw.com</a>	McAvoy Consulting, LLC 161-16 84th Drive Jamaica, NY 11432 Telephone: (917) 750-8131 <a href="http://www.mac-consulting.org">www.mac-consulting.org</a>
Walter Mack <a href="mailto:wmack@doarlaw.com">wmack@doarlaw.com</a>	Annemarie McAvoy <a href="mailto:mcavoypc@rocketmail.com">mcavoypc@rocketmail.com</a>

5. Neither Mack nor McAvoy has been admitted *pro hac vice* before this Court in the last two years.

6. Neither Mack nor McAvoy engages in the practice of law from an office located in the District of Columbia.

7. In accordance with the Local Rules, including LCrR 44.1(d), attached hereto as Exhibit A is the Declaration of Mack, and attached hereto as Exhibit B is the Declaration of McAvoy, attesting to the representations contained herein.

- 8.** Mack and McAvoy will abide by the Local Rules and other rules of this Court.
- 9.** Both Mack and McAvoy consent to the designation made herein by Counsel.

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO  
PERMIT APPEARANCE *PRO HAC VICE***

This motion and the attached declaration meet all of the requirements of the Local Rules, including LCrR 44.1(d).

WHEREFORE, Counsel respectfully requests that this Court enter the accompanying Order permitting Walter Mack and Annemarie McAvoy to appear *pro hac vice* as co-counsel for Richard W. Gates III.

Respectfully submitted,

/s/Shanlon Wu  
Shanlon Wu  
D.C. Bar No. 422910  
Wu, Grohovsky & Whipple, PLLC  
Ronald Reagan Building and International  
Trade Center  
1300 Pennsylvania Avenue, NW, Suite 700  
Washington, DC 20004  
swu@dcwhitecollar.com  
202-204-3053 office  
202-747-7518 fax  
*Attorney for Richard W. Gates III*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of November 2017, a copy of the above Motion and Memorandum of Points and Authorities to Permit Appearance *Pro Hac Vice* of Counsel for Richard W. Gates III was electronically served via the CM/ECF system to the following persons:

**Andrew Weissmann**

U.S. DEPARTMENT OF JUSTICE  
Special Counsel's Office  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

**Greg Donald Andres**

U.S. DEPARTMENT OF JUSTICE  
Special Counsel's Office  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

**Kyle Renee Freeny**

U.S. DEPARTMENT OF JUSTICE  
Special Counsel's Office  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Respectfully submitted,

/s/Shanlon Wu  
Shanlon Wu  
D.C. Bar No. 422910  
Wu, Grohovsky & Whipple, PLLC  
Ronald Reagan Building and International  
Trade Center  
1300 Pennsylvania Avenue, NW, Suite 700  
Washington, DC 20004  
swu@dcwhitecollar.com  
202-204-3053 office  
202-747-7518 fax  
*Attorney for Richard W. Gates III*